REMARKS

Applicants respectfully request further examination and reconsideration in view of the arguments set forth fully below. Claims 1-24 were previously pending in this Application. Within the Office Action, Claims 1-24 have been rejected. Accordingly, Claims 1-24 are now pending in the application.

Rejections Under 35 U.S.C. § 102

Within the Office Action, Claims 1-24 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication No. 2003/0204612 to Warren ("Warren"). The Applicants respectfully disagree. Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface.

Warren teaches a system and method for facilitating device communication, management and control in a network. The apparatus of Warren includes a command translator operable to receive the command and generate at least one device command corresponding to the command. [Warren, Abstract] Warren also teaches that the apparatus includes a plurality of protocol converters each operable to receive at least one device command, translate the at least one device command from a first protocol to a second protocol, and communicate the at least one device command to one or more network elements. [Warren, Abstract] Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface.

Warren teaches that an abstraction device 106 may allow a manager 102 to communicate and exchange information with a network element 108 when manager 102 and network element 108 use different communication protocols. [Warren, ¶ 0020] Warren further teaches that in a particular embodiment, the manager 102 communicates using a web services protocol, and abstraction device 106 translates between the web services protocol and the protocols used by network elements 108, which allows the manager 102 to communicate with different network elements 108 using a common protocol. [Warren, ¶ 0020] However, this common protocol referred to within the teachings of Warren is specifically related to the manager 102 and not formatted in a *common* application programming interface, as claimed within the presently pending claims. As described above, Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface.

In contrast to the teachings of Warren, the methods and apparatuses of the present invention include translating commands formatted in different protocols into a common application programming interface. Network translator modules act as translators between a plurality of network protocols and a single, common application programming interface (API) for network communication. Each unique translator module translates between the common API and a corresponding unique network protocol. As described above, Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface.

The independent Claim 1 is directed to a method comprising detecting at least one device, detecting a protocol associated with each device, matching the detected protocol with a protocol translator module and using a protocol translator module to translate a command formatted in the protocol into a translated command formatted in a *common* application programming interface. As described above, Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 1 is allowable over the teachings of Warren.

Claims 2-6 are all dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Warren. Accordingly, Claims 2-6 are all also allowable as being dependent on an allowable base claim.

The independent Claim 7 is directed to a system comprising means for detecting at least one device, means for detecting a protocol associated with each device, means for matching the detected protocol with a protocol translator module and means for using the protocol translator module to translate a command formatted in the protocol into a translated command formatted in a common application programming interface. As described above, Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 7 is allowable over the teachings of Warren.

The independent Claim 8 is directed to a method comprising detecting at least one service, detecting a protocol associated with each service, matching the detected protocol with a protocol translator module and using a protocol translator module to translate a command formatted in the protocol into a translated command formatted in a common application programming interface. As described above, Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application

programming interface. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 8 is allowable over the teachings of Warren.

The independent Claim 9 is directed to a method comprising detecting a plurality of devices wherein each unique device communicates using a corresponding protocol and displaying an indication of each device if a protocol translator module is matched with the corresponding protocol. Warren does not teach displaying an indication of each device if a protocol translator module is matched with the corresponding protocol. Warren teaches identifying communications protocol used by a network element and mapping information in command to a device command, but not displaying an indication if a protocol translator module is matched with the corresponding protocol. For at least these reasons, the independent Claim 9 is allowable over the teachings of Warren.

Claims 10-16 are all dependent on the independent Claim 9. As described above, the independent Claim 9 is allowable over the teachings of Warren. Accordingly, Claims 10-16 are all also allowable as being dependent on an allowable base claim.

The independent Claim 17 is directed to a method comprising identifying a plurality of protocol translator modules wherein each protocol translator module is associated with a unique protocol, storing a list representing the plurality of protocol translator modules, displaying an indication of each device having a device protocol that is compatible with one of the plurality of protocol translator modules in the list and translating a command formatted in the device protocol into a translated command formatted in a common application programming interface through one of the plurality of protocol translator modules. As described above, Warren does not teach translating a command formatted in a protocol into a translated command formatted in a *common* application programming interface. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 17 is allowable over the teachings of Warren.

Claims 18 and 19 are both dependent on the independent Claim 17. As described above, the independent Claim 17 is allowable over the teachings of Warren. Accordingly, Claims 18 and 19 are both also allowable as being dependent on an allowable base claim.

The independent Claim 20 is directed to a system comprising an application configured for operating through a common application programming interface, a first device configured for operating using a first protocol, a second device configured for operating using a second protocol and a protocol translation layer configured for searching for a first protocol translation module corresponding to the first protocol and for searching for a second protocol translation module

corresponding to the second protocol. As described above, Warren does not teach an application configured for operating through a *common* application programming interface. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 20 is allowable over the teachings of Warren.

Claims 21 and 22 are both dependent on the independent Claim 20. As described above, the independent Claim 20 is allowable over the teachings of Warren. Accordingly, Claims 21 and 22 are both also allowable as being dependent on an allowable base claim.

The independent Claim 23 is directed to a network protocol translation system comprising a processor that executes a run time process that uses only a single application programming interface for network communication, wherein the processor enables the run time process to communicate via a first network protocol by executing a first translation module that translates between the first network protocol and the application programming interface and wherein the processor enables the run time process to communicate via a second network protocol, different from the first network protocol, by executing a second translation module that translates between the second network protocol and the application programming interface. As described above, Warren does not teach a processor that executes a run time process that uses only a single application programming interface for network communication. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 23 is allowable over the teachings of Warren.

The independent Claim 24 is directed to a method, executed on a computing platform, comprising the acts of executing a run time process that uses only a single application programming interface for network communication, enabling the run time process to communicate via a first network protocol by executing a first translation module that translates between the first network protocol and the application programming interface and enabling the run time process to communicate via a second network protocol, different from the first network protocol, by executing a second translation module that translates between the second network protocol and the application programming interface. As described above, Warren does not teach executing a run time process that uses only a single application programming interface for network communication. Warren teaches translating into protocols corresponding to specific devices. For at least these reasons, the independent Claim 24 is allowable over the teachings of Warren.

For the reasons given above, the applicant respectfully submits that the claims are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
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Dated: January 7, 2008 By: /Jonathan O. Owens/

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